

# **EXHIBIT E**

1 Scott R. Mosko (State Bar No. 106070)  
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3 GARRETT & DUNNER, L.L.P.  
4 Stanford Research Park  
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7 Telephone: (650) 849-6600  
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6 Attorneys for Defendants  
7 Connectu LLC, Cameron Winklevoss,  
8 Tyler Winklevoss, Howard Winklevoss,  
9 and Divya Narendra  
10

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
11 COUNTY OF SANTA CLARA  
12

13 THE FACEBOOK, INC.

14 Plaintiff,

15 v.

16 CONNECTU LLC, CAMERON WINKLEVOSS,  
17 TYLER WINKLEVOSS, HOWARD  
18 WINKLEVOSS, DIVYA NARENDRA, AND  
19 DOES 1-25,

20 Defendants.  
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CASE NO. 105 CV 047381

**RESPONSE AND OBJECTIONS OF  
DEFENDANT CAMERON  
WINKLEVOSS TO PLAINTIFFS  
FIRST SET OF SPECIAL  
INTERROGATORIES (NOS. 1-23)**

1 **PROPOUNDING PARTY:** Plaintiff THEFACEBOOK, INC.

2 **RESPONDING PARTY:** Defendant CAMERON WINKLEVOSS

3 **SET NO.:** ONE (1)

4  
5 TO PLAINTIFF AND ITS ATTORNEYS OF RECORD:

6 The above-named party hereby responds, pursuant to California Code of Civil Procedure  
7 Section 2030.210(a), to the first set of interrogatories as follows:

8 **GENERAL OBJECTIONS**

9 1. Responding party objects to each interrogatory and to the definitions and instructions to  
10 the extent they seek to impose obligations that are broader than or inconsistent with the California  
11 Rules of Civil Procedure and applicable Local Rules or court orders.

12 2. Responding party objects to each interrogatory, and to the definitions and instructions to  
13 the extent they seek the disclosure of information protected by the attorney-client privilege, attorney  
14 work-product doctrine, or any other applicable privilege or protection, as provided by any applicable  
15 law. Responding party does not intend to produce such privileged or protected documents or  
16 information, and the inadvertent disclosure of such is not to be deemed a waiver of any privilege.  
17 Responding party expressly reserves the right to object to the introduction at trial or any other use of  
18 such information that may be inadvertently disclosed. In addition, Responding party objects to the  
19 interrogatories and all definitions and instructions to the extent they seek and/or require Responding  
20 party to produce a privilege log for documents or information falling within the attorney-client  
21 privilege or work-product doctrine, if such documents or information were created after the date that  
22 this lawsuit was filed.

23 3. Responding party objects to each interrogatory and all other definitions and instructions  
24 to the extent they are vague, overly broad, unduly burdensome, exceed the boundaries of  
25 discoverable information, or fail to describe the information sought with the required reasonable  
26 particularity.

27 4. Responding party objects to each interrogatory and all definitions and instructions to the  
28 extent the burden or expense of the proposed discovery outweighs its likely benefit, given the needs

1 the discovery of admissible evidence regarding personal jurisdiction. Information regarding  
2 ConnectU.com can be located by visiting www.connectU.com.

3 12. Subject to the general objections and the objections to the definitions and instructions  
4 incorporated herein, Responding party answers as follows. Responding party objects to this  
5 interrogatory as overly burdensome, irrelevant, and not likely to lead to the discovery of admissible  
6 evidence regarding personal jurisdiction.

7 13. Subject to the general objections and the objections to the definitions and instructions  
8 incorporated herein, Responding party answers as follows. This interrogatory is vague and  
9 overbroad. It is compound, complex, and effectively represents at least eight separate  
10 interrogatories. Responding party is informed and believes that subject to objections, ConnectU's  
11 responses to either Plaintiff's First Set of Interrogatories, or First Request for Production of  
12 Documents may include information about ConnectU L.L.C. and how it was formed and maintained.  
13 To the extent such documents and/or responses include or involve Responding party, he incorporates  
14 such by this reference.

15 14. Subject to the general objections and the objections to the definitions and instructions  
16 incorporated herein, Responding party answers as follows. This interrogatory also calls for  
17 information regarding the "Winklevoss Companies", as identified in the definition section. As such,  
18 this interrogatory seeks information that is irrelevant and not calculated to lead to the discovery of  
19 admissible evidence concerning personal jurisdiction, and Responding party possesses no such  
20 information. This interrogatory is vague and overbroad. It is compound, complex, and effectively  
21 represents at least six separate interrogatories. Responding party is informed and believes that  
22 subject to objections, ConnectU's responses to either Plaintiff's First Set of Interrogatories, or First  
23 Request for Production of Documents may include information about ConnectU L.L.C. and its  
24 directors, officers and employees, to the extent it has them. To the extent such documents and/or  
25 responses include or involve Responding party, he incorporates such by this reference.

26 15. Subject to the general objections and the objections to the definitions and instructions  
27 incorporated herein, Responding party answers as follows. Identifying and persons residing in  
28 California is overly burdensome. Responding party cannot determine with accuracy, or at all,

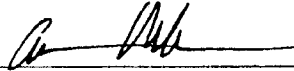
**VERIFICATION**

Cameron Winklevoss, states as follows:

I am one of the Defendants in the foregoing action. I have read the foregoing Response and Objections to Plaintiffs First Set of Special Interrogatories (Nos. 1-23) and know the contents thereof. The matters stated herein are true of my knowledge except as to the matters stated herein on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed at Greenwich, CT, this 1 day of December, 2005.



Cameron Winklevoss

1 Scott R. Mosko (State Bar No. 106070)  
2 FINNEGAN, HENDERSON, FARABOW,  
3 GARRETT & DUNNER, L.L.P.  
4 Stanford Research Park  
5 700 Hansen Way  
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10 Attorneys for Defendants  
11 Connectu LLC, Cameron Winklevoss,  
12 Tyler Winklevoss, Howard Winklevoss,  
13 and Divya Narendra

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SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF SANTA CLARA

THE FACEBOOK, INC.

Plaintiff,

v.

CONNECTU LLC, CAMERON WINKLEVOSS,  
TYLER WINKLEVOSS, HOWARD  
WINKLEVOSS, DIVYA NARENDRA, AND  
DOES 1-25,

Defendants.

CASE NO. 105 CV 047381

**RESPONSE AND OBJECTIONS OF  
DEFENDANT DIVYA NARENDRA TO  
PLAINTIFFS FIRST SET OF SPECIAL  
INTERROGATORIES (NOS 1-23)**

1 **PROPOUNDING PARTY:** Plaintiff THEFACEBOOK, INC.

2 **RESPONDING PARTY:** Defendant DIVYA NARENDRA

3 **SET NO.:** ONE (1)

4  
5 TO PLAINTIFF AND ITS ATTORNEYS OF RECORD:

6 The above-named party hereby responds, pursuant to California Code of Civil Procedure  
7 Section 2030.210(a), to the first set of interrogatories as follows:

8 **GENERAL OBJECTIONS**

9 1. Responding party objects to each interrogatory and to the definitions and instructions to  
10 the extent they seek to impose obligations that are broader than or inconsistent with the California  
11 Rules of Civil Procedure and applicable Local Rules or court orders.

12 2. Responding party objects to each interrogatory, and to the definitions and instructions to  
13 the extent they seek the disclosure of information protected by the attorney-client privilege, attorney  
14 work-product doctrine, or any other applicable privilege or protection, as provided by any applicable  
15 law. Responding party does not intend to produce such privileged or protected documents or  
16 information, and the inadvertent disclosure of such is not to be deemed a waiver of any privilege.  
17 Responding party expressly reserves the right to object to the introduction at trial or any other use of  
18 such information that may be inadvertently disclosed. In addition, Responding party objects to the  
19 interrogatories and all definitions and instructions to the extent they seek and/or require Responding  
20 party to produce a privilege log for documents or information falling within the attorney-client  
21 privilege or work-product doctrine, if such documents or information were created after the date that  
22 this lawsuit was filed.

23 3. Responding party objects to each interrogatory and all other definitions and instructions  
24 to the extent they are vague, overly broad, unduly burdensome, exceed the boundaries of  
25 discoverable information, or fail to describe the information sought with the required reasonable  
26 particularity.

27 4. Responding party objects to each interrogatory and all definitions and instructions to the  
28 extent the burden or expense of the proposed discovery outweighs its likely benefit, given the needs

1 the discovery of admissible evidence regarding personal jurisdiction. Information regarding  
2 ConnectU.com can be located by visiting [www.connectU.com](http://www.connectU.com).

3 12. Subject to the general objections and the objections to the definitions and instructions  
4 incorporated herein, Responding party answers as follows. Responding party objects to this  
5 interrogatory as overly burdensome, irrelevant, and not likely to lead to the discovery of admissible  
6 evidence regarding personal jurisdiction.

7 13. Subject to the general objections and the objections to the definitions and instructions  
8 incorporated herein, Responding party answers as follows. This interrogatory is vague and  
9 overbroad. It is compound, complex, and effectively represents at least eight separate  
10 interrogatories. Responding party is informed and believes that subject to objections, ConnectU's  
11 responses to either Plaintiff's First Set of Interrogatories, or First Request for Production of  
12 Documents may include information about ConnectU L.L.C. and how it was formed and maintained.  
13 To the extent such documents and/or responses include or involve Responding party, he incorporates  
14 such by this reference.

15 14. Subject to the general objections and the objections to the definitions and instructions  
16 incorporated herein, Responding party answers as follows. This interrogatory also calls for  
17 information regarding the "Winklevoss Companies", as identified in the definition section. As such,  
18 this interrogatory seeks information that is irrelevant and not calculated to lead to the discovery of  
19 admissible evidence concerning personal jurisdiction, and Responding party possesses no such  
20 information. This interrogatory is vague and overbroad. It is compound, complex, and effectively  
21 represents at least six separate interrogatories. Responding party is informed and believes that  
22 subject to objections, ConnectU's responses to either Plaintiff's First Set of Interrogatories, or First  
23 Request for Production of Documents may include information about ConnectU L.L.C. and its  
24 directors, officers and employees, to the extent it has them. To the extent such documents and/or  
25 responses include or involve Responding party, he incorporates such by this reference.

26 15. Subject to the general objections and the objections to the definitions and instructions  
27 incorporated herein, Responding party answers as follows. Identifying and persons residing in  
28 California is overly burdensome. Responding party cannot determine with accuracy, or at all,



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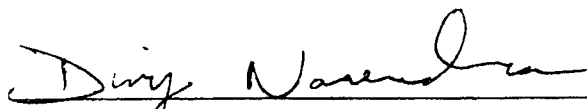
**VERIFICATION**

Divya Narendra, states as follows:

I am one of the Defendants in the foregoing action. I have read the foregoing Response and Objections to Plaintiffs First Set of Special Interrogatories (Nos. 1-23) and know the contents thereof. The matters stated herein are true of my knowledge except as to the matters stated herein on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed at New York, NY, this 3 day of December, 2005.

  
Divya Narendra

1 Scott R. Mosko (State Bar No. 106070)  
2 FINNEGAN, HENDERSON, FARABOW,  
3 GARRETT & DUNNER, L.L.P.  
4 Stanford Research Park  
5 700 Hansen Way  
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7 Telephone: (650) 849-6600  
8 Facsimile: (650) 849-6666

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10 Attorneys for Defendants  
11 Connectu LLC, Cameron Winklevoss,  
12 Tyler Winklevoss, Howard Winklevoss,  
13 and Divya Narendra

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SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF SANTA CLARA

THE FACEBOOK, INC.

Plaintiff,

v.

CONNECTU LLC, CAMERON WINKLEVOSS,  
TYLER WINKLEVOSS, HOWARD  
WINKLEVOSS, DIVYA NARENDRA, AND  
DOES 1-25,

Defendants.

CASE NO. 105 CV 047381

**RESPONSE AND OBJECTIONS TO  
PLAINTIFFS FIRST SET OF  
INTERROGATORIES (NOS. 1-23) OF  
DEFENDANT HOWARD  
WINKLEVOSS**

1 **PROPOUNDING PARTY:** Plaintiff THEFACEBOOK, INC.

2 **RESPONDING PARTY:** Defendant HOWARD WINKLEVOSS

3 **SET NO.:** ONE (1)

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5 TO PLAINTIFF AND ITS ATTORNEYS OF RECORD:

6 The above-named party hereby responds, pursuant to California Code of Civil Procedure  
7 Section 2030.210(a), to the first set of interrogatories as follows:

8 **GENERAL OBJECTIONS**

9 1. Responding party objects to each interrogatory and to the definitions and instructions to  
10 the extent they seek to impose obligations that are broader than or inconsistent with the California  
11 Rules of Civil Procedure and applicable Local Rules or court orders.

12 2. Responding party objects to each interrogatory, and to the definitions and instructions to  
13 the extent they seek the disclosure of information protected by the attorney-client privilege, attorney  
14 work-product doctrine, or any other applicable privilege or protection, as provided by any applicable  
15 law. Responding party does not intend to produce such privileged or protected documents or  
16 information, and the inadvertent disclosure of such is not to be deemed a waiver of any privilege.  
17 Responding party expressly reserves the right to object to the introduction at trial or any other use of  
18 such information that may be inadvertently disclosed. In addition, Responding party objects to the  
19 interrogatories and all definitions and instructions to the extent they seek and/or require Responding  
20 party to produce a privilege log for documents or information falling within the attorney-client  
21 privilege or work-product doctrine, if such documents or information were created after the date that  
22 this lawsuit was filed.

23 3. Responding party objects to each interrogatory and all other definitions and instructions  
24 to the extent they are vague, overly broad, unduly burdensome, exceed the boundaries of  
25 discoverable information, or fail to describe the information sought with the required reasonable  
26 particularity.

27 4. Responding party objects to each interrogatory and all definitions and instructions to the  
28 extent the burden or expense of the proposed discovery outweighs its likely benefit, given the needs

1 “located” as vague and ambiguous. Subject to such objection, Responding party responds as  
2 follows: Fall 2004.

3 11. Subject to the general objections and the objections to the definitions and instructions  
4 incorporated herein, Responding party answers as follows. This interrogatory is vague, overbroad  
5 and ambiguous. Responding party has no knowledge as to what services are provided through the  
6 ConnectU website.

7 12. Subject to the general objections and the objections to the definitions and instructions  
8 incorporated herein, Responding party answers as follows. Responding party objects to this  
9 interrogatory as overly burdensome, irrelevant, and not likely to lead to the discovery of admissible  
10 evidence regarding personal jurisdiction.

11 13. Subject to the general objections and the objections to the definitions and instructions  
12 incorporated herein, Responding party answers as follows. This interrogatory is vague and  
13 overbroad. It is compound, complex, and effectively represents at least eight separate  
14 interrogatories. Responding party is informed and believes that subject to objections, ConnectU’s  
15 responses to either Plaintiff’s First Set of Interrogatories, or First Request for Production of  
16 Documents may include information about ConnectU L.L.C. and how it was formed and maintained.  
17 To the extent such documents and/or responses include or involve Responding party, he incorporates  
18 such by this reference.

19 14. Subject to the general objections and the objections to the definitions and instructions  
20 incorporated herein, Responding party answers as follows. This interrogatory also calls for  
21 information regarding the “Winklevoss Companies”, as identified in the definition section. As such,  
22 this interrogatory seeks information that is irrelevant and not calculated to lead to the discovery of  
23 admissible evidence concerning personal jurisdiction, and Responding party possesses no such  
24 information. This interrogatory is vague and overbroad. It is compound, complex, and effectively  
25 represents at least six separate interrogatories. Responding party is informed and believes that  
26 subject to objections, ConnectU’s responses to either Plaintiff’s First Set of Interrogatories, or First  
27 Request for Production of Documents may include information about ConnectU L.L.C. and its  
28

1 directors, officers and employees, to the extent is has them. To the extent such documents and/or  
2 responses include or involve Responding party, he incorporates such by this reference.

3 15. Subject to the general objections and the objections to the definitions and instructions  
4 incorporated herein, Responding party answers as follows. Identifying and persons residing in  
5 California is overly burdensome. Responding party cannot determine with accuracy, or at all,  
6 whether any person resides in California. With respect to students, it is Facebook, Inc.'s position  
7 that students are citizens of their home state. Responding party has no way of determining a  
8 student's home state. This interrogatory also calls for information regarding the "Winklevoss  
9 Companies", as identified in the definition section. As such, this interrogatory seeks information  
10 that is irrelevant and not calculated to lead to the discovery of admissible evidence concerning  
11 personal jurisdiction, and Responding party possesses no such information. Responding party took  
12 no action regarding advertising, promoting and/or marketing of ConnectU.

13 16. Subject to the general objections and the objections to the definitions and instructions  
14 incorporated herein, Responding party answers as follows. Identifying businesses currently or  
15 formerly licensed, located, based, or incorporated in California, or with facilities in California, is  
16 overly burdensome. Responding party cannot determine with accuracy, or at all, whether a business  
17 is or was licensed, located, based, and/or incorporated in California, or has or had facilities there.  
18 This interrogatory also calls for information regarding the "Winklevoss Companies", as identified in  
19 the definition section. As such, this interrogatory seeks information that is irrelevant and not  
20 calculated to lead to the discovery of admissible evidence concerning personal jurisdiction, and  
21 Responding party possesses no such information. Subject to such objections, Responding party  
22 answers as follows: None.

23 17. Subject to the general objections and the objections to the definitions and instructions  
24 incorporated herein, Responding party answers as follows. This contention interrogatory calls for a  
25 legal conclusion. Some of the reasons why defending this lawsuit in California would be  
26 burdensome include: none of the witnesses involving ConnectU's activities are located in  
27 California. Instead, most if not all such witnesses are located on the east coast of the United States.  
28 As such, they are outside the subpoena power of California, making discovery nearly impossible and

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**VERIFICATION**

Howard Winklevoss, states as follows:

I am one of the Defendants in the foregoing action. I have read the foregoing Response and Objections to Plaintiffs First Set of Special Interrogatories (Nos. 1-23) and know the contents thereof. The matters stated herein are true of my knowledge except as to the matters stated herein on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed at Greenwich, CT this 2 day of December, 2005.

  
Howard Winklevoss

1 Scott R. Mosko (State Bar No. 106070)  
2 FINNEGAN, HENDERSON, FARABOW,  
3 GARRETT & DUNNER, L.L.P.  
4 Stanford Research Park  
5 700 Hansen Way  
6 Palo Alto, California 94304  
7 Telephone: (650) 849-6600  
8 Facsimile: (650) 849-6666

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10 Attorneys for Defendants  
11 Connectu LLC, Cameron Winklevoss,  
12 Tyler Winklevoss, Howard Winklevoss,  
13 and Divya Narendra

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SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF SANTA CLARA

THE FACEBOOK, INC.

Plaintiff,

v.

CONNECTU LLC, CAMERON WINKLEVOSS,  
TYLER WINKLEVOSS, HOWARD  
WINKLEVOSS, DIVYA NARENDRA, AND  
DOES 1-25,

Defendants.

CASE NO. 105 CV 047381

**RESPONSE OF DEFENDANT TYLER  
WINKLEVOSS TO PLAINTIFFS  
FIRST SET OF SPECIAL  
INTERROGATORIES (NOS. 1-23)**

1 **PROPOUNDING PARTY:** Plaintiff THEFACEBOOK, INC.  
2 **RESPONDING PARTY:** Defendant TYLER WINKLEVOSS  
3 **SET NO.:** ONE (1)  
4

5 TO PLAINTIFF AND ITS ATTORNEYS OF RECORD:

6 The above-named party hereby responds, pursuant to California Code of Civil Procedure  
7 Section 2030.210(a), to the first set of interrogatories as follows:

8 **GENERAL OBJECTIONS**

9 1. Responding party objects to each interrogatory and to the definitions and instructions to  
10 the extent they seek to impose obligations that are broader than or inconsistent with the California  
11 Rules of Civil Procedure and applicable Local Rules or court orders.

12 2. Responding party objects to each interrogatory, and to the definitions and instructions to  
13 the extent they seek the disclosure of information protected by the attorney-client privilege, attorney

14 ~~work-product doctrine, or any other applicable privilege or protection, as provided by any applicable~~  
15 law. Responding party does not intend to produce such privileged or protected documents or  
16 information, and the inadvertent disclosure of such is not to be deemed a waiver of any privilege.

17 Responding party expressly reserves the right to object to the introduction at trial or any other use of  
18 such information that may be inadvertently disclosed. In addition, Responding party objects to the  
19 interrogatories and all definitions and instructions to the extent they seek and/or require Responding  
20 party to produce a privilege log for documents or information falling within the attorney-client  
21 privilege or work-product doctrine, if such documents or information were created after the date that  
22 this lawsuit was filed.

23 3. Responding party objects to each interrogatory and all other definitions and instructions  
24 to the extent they are vague, overly broad, unduly burdensome, exceed the boundaries of  
25 discoverable information, or fail to describe the information sought with the required reasonable  
26 particularity.

27 4. Responding party objects to each interrogatory and all definitions and instructions to the  
28 extent the burden or expense of the proposed discovery outweighs its likely benefit, given the needs



1 the discovery of admissible evidence regarding personal jurisdiction. Information regarding  
2 ConnectU.com can be located by visiting [www.connectU.com](http://www.connectU.com).

3 12. Subject to the general objections and the objections to the definitions and instructions  
4 incorporated herein, Responding party answers as follows. Responding party objects to this  
5 interrogatory as overly burdensome, irrelevant, and not likely to lead to the discovery of admissible  
6 evidence regarding personal jurisdiction.

7 13. Subject to the general objections and the objections to the definitions and instructions  
8 incorporated herein, Responding party answers as follows. This interrogatory is vague and  
9 overbroad. It is compound, complex, and effectively represents at least eight separate  
10 interrogatories. Responding party is informed and believes that subject to objections, ConnectU's  
11 responses to either Plaintiff's First Set of Interrogatories, or First Request for Production of  
12 Documents may include information about ConnectU L.L.C. and how it was formed and maintained.  
13 To the extent such documents and/or responses include or involve Responding party, he incorporates  
14 such by this reference.

15 14. Subject to the general objections and the objections to the definitions and instructions  
16 incorporated herein, Responding party answers as follows. This interrogatory also calls for  
17 information regarding the "Winklevoss Companies", as identified in the definition section. As such,  
18 this interrogatory seeks information that is irrelevant and not calculated to lead to the discovery of  
19 admissible evidence concerning personal jurisdiction, and Responding party possesses no such  
20 information. This interrogatory is vague and overbroad. It is compound, complex, and effectively  
21 represents at least six separate interrogatories. Responding party is informed and believes that  
22 subject to objections, ConnectU's responses to either Plaintiff's First Set of Interrogatories, or First  
23 Request for Production of Documents may include information about ConnectU L.L.C. and its  
24 directors, officers and employees, to the extent it has them. To the extent such documents and/or  
25 responses include or involve Responding party, he incorporates such by this reference.

26 15. Subject to the general objections and the objections to the definitions and instructions  
27 incorporated herein, Responding party answers as follows. Identifying and persons residing in  
28 California is overly burdensome. Responding party cannot determine with accuracy, or at all,

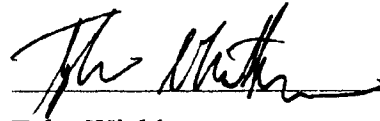
**VERIFICATION**

Tyler Winklevoss, states as follows:

I am one of the Defendants in the foregoing action. I have read the foregoing Response and Objections to Plaintiffs First Set of Special Interrogatories (Nos. 1-23) and know the contents thereof. The matters stated herein are true of my knowledge except as to the matters stated herein on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed at Greenwich, CT this 1 day of December, 2005.



Tyler Winklevoss

1 Scott R. Mosko (State Bar No. 106070)  
2 FINNEGAN, HENDERSON, FARABOW,  
3 GARRETT & DUNNER, L.L.P.  
4 Stanford Research Park  
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7 Telephone: (650) 849-6600  
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10 Attorneys for Defendants  
11 Connectu LLC, Cameron Winklevoss,  
12 Tyler Winklevoss, Howard Winklevoss,  
13 and Divya Narendra

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SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF SANTA CLARA

THE FACEBOOK, INC.

Plaintiff,

v.

CONNECTU LLC, CAMERON WINKLEVOSS,  
TYLER WINKLEVOSS, HOWARD  
WINKLEVOSS, DIVYA NARENDRA, AND  
DOES 1-25,

Defendants.

CASE NO. 105 CV 047381

**RESPONSE OF DEFENDANT  
CONNECTU LLC TO PLAINTIFFS  
FIRST SET OF SPECIAL  
INTERROGATORIES (1-23)**

1 **PROPOUNDING PARTY:** Plaintiff THEFACEBOOK, INC.

2 **RESPONDING PARTY:** Defendant CONNECTU LLC

3 **SET NO.:** ONE (1)

4  
5 TO PLAINTIFF AND ITS ATTORNEYS OF RECORD:

6 The above-named party hereby responds, pursuant to California Code of Civil Procedure  
7 Section 2030.210(a), to the first set of interrogatories as follows:

8 **GENERAL OBJECTIONS**

9 1. Responding party objects to each interrogatory and to the definitions and instructions to  
10 the extent they seek to impose obligations that are broader than or inconsistent with the California  
11 Code of Civil Procedure and applicable Local Rules or court orders.

12 2. Responding party objects to each interrogatory, and to the definitions and instructions to  
13 the extent they seek the disclosure of information protected by the attorney-client privilege, attorney  
14 work-product doctrine, or any other applicable privilege or protection, as provided by any applicable  
15 law. Responding party does not intend to produce such privileged or protected documents or  
16 information, and the inadvertent disclosure of such is not to be deemed a waiver of any privilege.  
17 Responding party expressly reserves the right to object to the introduction at trial or any other use of  
18 such information that may be inadvertently disclosed. In addition, Responding party objects to the  
19 interrogatories and all definitions and instructions to the extent they seek and/or require Responding  
20 party to produce a privilege log for documents or information falling within the attorney-client  
21 privilege or work-product doctrine, if such documents or information were created after the date that  
22 this lawsuit was filed.

23 3. Responding party objects to each interrogatory and all other definitions and instructions  
24 to the extent they are vague, overly broad, unduly burdensome, exceed the boundaries of  
25 discoverable information, or fail to describe the information sought with the required reasonable  
26 particularity.

27 4. Responding party objects to each interrogatory and all definitions and instructions to the  
28 extent the burden or expense of the proposed discovery outweighs its likely benefit, given the needs

1 interrogatory as overly burdensome, irrelevant, and not likely to lead to the discovery of admissible  
2 evidence regarding personal jurisdiction.

3 13. Subject to the general objections and the objections to the definitions and instructions  
4 incorporated herein, Responding party answers as follows. This interrogatory is vague and  
5 overbroad. It is compound, complex and effectively represents at least eight separate interrogatories.  
6 To the extent ConnectU has not already produced documents about its formation and maintenance,  
7 all such non-privileged documents will be produced.

8 14. Subject to the general objections and the objections to the definitions and instructions  
9 incorporated herein, Responding party answers as follows. This interrogatory also calls for  
10 information regarding the "Winklevoss Companies", as identified in the definition section. As such,  
11 this interrogatory seeks information that is irrelevant and not calculated to lead to the discovery of  
12 admissible evidence concerning personal jurisdiction, and Responding party possesses no such  
13 information. This interrogatory is vague and overbroad. It is compound, complex and effectively  
14 represents at least six separate interrogatories. To the extent ConnectU has not already produced  
15 documents regarding its directors, officers, agents, and employees, all such non-privileged  
16 documents will be produced.

17 15. Subject to the general objections and the objections to the definitions and instructions  
18 incorporated herein, Responding party answers as follows. Identifying and persons residing in  
19 California is overly burdensome. Responding party cannot determine with accuracy, or at all,  
20 whether any person resides in California. With respect to students, it is Facebook, Inc.'s position  
21 that students are citizens of their home state. Responding party has no way of determining a  
22 student's home state. This interrogatory also calls for information regarding the "Winklevoss  
23 Companies", as identified in the definition section. As such, this interrogatory seeks information  
24 that is irrelevant and not calculated to lead to the discovery of admissible evidence concerning  
25 personal jurisdiction, and Responding party possesses no such information. To the extent ConnectU  
26 has not already produced documents regarding its advertising, promotional and marketing activities,  
27 all such non-privileged documents will be produced.

**VERIFICATION**


Cameron Winklevoss, states as follows:

I, Cameron Winklevoss, declare under penalty of perjury that the following statements are true and correct.

I am Co-founder of ConnectU, a Connecticut corporation, and as such officer, I make this verification for and on its behalf.

I have read the foregoing Responses and Objections to Plaintiffs First Set of Special Interrogatories (Nos. 1-23) and am informed and believe that the matters stated therein are true and correct.

Executed at Greenwich, Connecticut, this 1 day of December, 2005.



Cameron Winklevoss